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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 DEBORAH FRAME-WILSON, *et al.*, on behalf
11 of themselves and all others similarly situated,

Case No. 2:20-cv-00424-JHC

12 Plaintiffs,

13 STIPULATED MOTION AND ORDER
14 REGARDING CLASS CERTIFICATION
15 BRIEFING SCHEDULE

16 Defendant.
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18 ELIZABETH DE COSTER, *et al.*, on behalf of
19 themselves and all other similarly situated,

Case No. 2:21-cv-00693-JHC

20 Plaintiffs,

21 v.
22 AMAZON.COM, INC., a Delaware
23 corporation,

24 Defendant.
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STIPULATED MOTION AND ORDER REGARDING
CLASS CERT. BRIEFING
Case Nos. 2:20-cv-00424-JHC, 2:21-cv-00693-JHC

STIPULATION

The parties, by and through their counsel, have agreed and stipulate as follows:

1. The Court entered the parties' stipulated motion and proposed order for a 30-day interim extension of the existing class certification schedules, while the parties discussed a potentially longer extension. The parties have since met and conferred and agree that good cause justifies a further one-month extension of the Court's current class certification briefing schedule in the *De Coster* and *Frame-Wilson* cases.

2. After Amazon filed its opposition to class certification in *De Coster*, the parties met and conferred concerning an extension of time that Plaintiffs requested in order to address the arguments and materials in that opposition brief and accompanying expert report. Based on that meet and confer, the parties agreed to a further 30-day extension of the existing class certification schedules, as follows:

<i>Frame-Wilson</i>		
Briefs	Current Deadline [Dkt. 232]	Proposed Deadline
Class Certification Brief	January 21, 2025	February 20, 2025
Class Certification Opposition Brief	April 21, 2025	May 21, 2025
Reply Brief ISO Class Certification	June 23, 2025	July 23, 2025

<i>De Coster</i>		
Briefs	Current Deadline [Dkt. 257]	Proposed Deadline
Reply Brief ISO Class Certification and Opposition to Amazon's Motion to Exclude & any Motion to Exclude Amazon's Expert[s]	February 24, 2025	March 26, 2025
Amazon's Reply ISO Motion to Exclude & Opposition to Plaintiffs' Motion to Exclude	April 2, 2025	May 2, 2025
Plaintiffs' Reply ISO Motion to Exclude	April 30, 2025	May 30, 2025

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel of record, and the parties ask the Court to order, that:

3. The class certification deadlines contained in *Frame-Wilson*, Dkt. No. 232 and *De Coster*, Dkt. No. 257 are modified as follows.

4. In *Frame-Wilson*, Plaintiffs' deadline to file their class certification motion is **February 20, 2025**; Amazon's deadline to oppose Plaintiffs' class certification motion is **May 21, 2025**; Plaintiffs' deadline to file their reply in support of class certification is **July 23, 2025**.

5. In *De Coster*, Plaintiffs' deadline to file their reply in support of class certification, their opposition to any motion to exclude their expert[s], and any motion to exclude Amazon's expert[s] is **March 26, 2025**; Amazon's opposition to Plaintiffs' motion to exclude Amazon's expert is **May 2, 2025**; Plaintiffs' deadline to file a reply in support of their motion to exclude Amazon's expert is **May 30, 2025**.

6. Amazon reserves the right to seek a further modification of any of its deadlines at an appropriate time.

IT IS SO STIPULATED.

DATED: January 3, 2025 HAGENS BERMAN SOBOL SHAPIRO LLP

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23 *Attorneys for Defendant Amazon.com, Inc.*

ORDER

Pursuant to stipulation, IT IS SO ORDERED. In *De Coster*, the Court DIRECTS the Clerk to re-note the motion at Dkt. # 180 for March 26, 2025, and the motion at Dkt. # 230 for May 2, 2025.

Dated: January 6, 2025.

John H. Chan

John H. Chun

UNITED STATES DISTRICT JUDGE